

In the United States District Court  
Middle District of Pennsylvania

WM Branch  
Vs. Plaintiff

Russian, et. al.  
Defendants

FILED  
HARRISBURG, PA

Civil Action No. 1: CV-00-1728

MAR 12 2004 (Judge CONNER)

MARY E. D'ANDREA, CLERK  
Per [Signature]

Hb ✓

Reply to Defendants motion to deny  
my motion for injunctive Relief

if it Please's this most majestic Tribune  
Here comes William Branch #3756 inmate at Sci-  
waymart Repling to Defendants motion to deny ~~my~~ me  
injunctive Relief.

( inclose Please find a copy of a letter I sent to defense  
Requesting a meeting to discuss Discovery Per your order)  
your Honor the defense continue to argue the  
controlling D.O.C. Policy is 807 and that they have the  
Right to force me to cut my hair OR face ~~Disc~~ Disciplinary  
action. either Ms Mosley has not Read this Policy and  
is depending on the information supplied by D.O.C. Staff  
OR she has Read it and does not understand it!

in any case D.O.C Policy (a copy) contained in her  
Brief Number 807 a reading at VI. Procedure A.(2.d.)  
states: an inmate Request for a hair style exemption  
based on Religion shall be in accordance with Dept.  
Policy DC-ADM 819, Religious activities a cop of Pg 8  
inclosed in my Documents and Declaration of Brief  
in Support of my motion to deny Summary Judgment  
about Page 21-24, citing Pg. 8 of DC-ADM 819 G. ~~2~~ b. - f

Reply to Defendant motion to deny injunctive Relief

Page 8 Doc Policy G.2. b was issued after I open this complaint in 2000, which I had Grieved and should be Payed legal fee's for causing the D.O.C. to change its Policy.

as this change happen after my initial complaint I did not have a chance to apply under the new Policy I also wish to Point out that for three yrs. the D.O.C. had not ask me to cut my hair, the fact that staff Transferred me to M-2 under MR friedman show's a conspiracy!

I should have been allowed to apply for a hair Exemption, This injunctive Relief comes on the heel of staff violating its D.O.C. Policy, Pastor Gagas never sent my Request to the Religious accommodation Review Committee thereby denying me Due Process also the Timing of this action as Summary Judgement was asked and Supplemental Pleading Denied, they (staff) demonstrates it Klandestine Conspiracy.

for the Record I was ordered to cut my Religious Based hair or Recieve a misconduct, when the Policy clearly states that during the time a inmate seeks and Exemption no action can be taken against him.

MR friedman state he was not going to wait while This issue "DRagged" it's way through the Court system (he alludes to this at number 14 in Def. Documents in opposition to my injunction). his words were "We" denoting others but in his statement he Lays it all on C/o GOWAT. at this same time MR friedman had Read this Policy I was showing it to him. I also spoke with Deputy Andrew who told MR Del Rosso to look into this matter they were all in the loop.

Reply to Defendants motion to deny my motion for injunctive Relief

a main Point of this motion for injunctive Relief is the Request to cut my hair did not accure untill I complained about the shower, for the Record I asked C/o Gowat if I could shower before 8:30 in order to Go to church he said: "why can't you shower the night before!" and he denied me to shower. No one was working on the shower for a three week period, as he would have the court Believe, nor did he allow me to shower Before 8:30 untill Supt Collieran ordered him to change the shower Time.

What I am asking this noble Court for is its Protection as one pleading before it, not to micro-munge the D.O.C. as counsel alleges.

The Staff has not followed it's own policies, it has violated my First amendment Rights of Freedom To exercise my Religious Beliefs: To clean myself before I Go Before my GOD To keep a razor off my hair as long as I am under a Vow of a Nazarete

~~14th~~ amendment Due Process, a fair and impartial hearing Equal Protection: other Religions are allowed to show before

There are inmates that are indians their ~~services~~ SERVICE. and not being who converted and the PRISON Gave them SIX months to see if they were Sincere. Then they Gave them exemption for their Hair. (5 yrs I have practiced my Religion)  
 Champhill as outlined in the Doc. Policy  
Benjamin V. Coughlin 905 F2d 571 at 577 (2 cert 1990)

Cert Denied. Stating: "There exists an alternative means of accommodating Plaintiffs Religious Rights without under minding the Legitimate Penological interests!"

Reply to defendants motion to deny my motion for  
Injunctive Relief

For The Reasons Stated below

Therefore I ask this august Court to Grant me  
~~Exemptive~~ Injunctive Relief, Remove Co/Gowat  
and MR Friedman so they can understand Justice  
will not be lied to, and others will understand Retaliation  
and Conspiracy to Violate the constitutional Rights of  
others and Racial discrimination will not Be Tolerated  
as I am a Black man, along with the fact that  
my Beliefs Run counter to what they Believe  
[R]eligious Prejudice is at the Root of these actions.

most Honorable Judge I ask that the D.O.C. change  
the exemption Policy to conform to 42 § 2000 CC 5(1.A)  
and that they Be forbidden to write misconducts on me  
OR force me to cut my hair any more P.S. MR Friedman

Come on the Block and Called G/Gowat my Co-Defendant Respectfully  
Proof of Service

MS Mosley S.D.A.G. Strawberry Sq 15<sup>th</sup> Harrisburg Pa 17120

Unsworn Declaration

I affirm under Penalty of the Law that the above is True

Date 3-4-04

William Branch CF3156  
Po Box 256  
Waymart Pa. 19472

3-1-04

per court order  
Dated 2-19-04William Branch CF3756  
PO Box 256  
Waymart Pa 19472RE: Branch vs. Russian  
civil action No: 1-00-1728ATTN: Ms Mosley SDAG  
STRAWBERRY Sq 15 FL  
HARRISBURG Pa 17120

madame per Rules of Civil ~~Proc~~ Procedure 26,  
56(e) .... answers to interrogatories etc, etc ....

I would appreciate you supplying me with answers  
to my interrogatories that I have supplied the D.O.C  
with if you do not want to meet with me I will  
forward a copy to you. as I am suppose to  
consult with you about discovery.

Please Respond as soon as possible as the court  
has set a dead line.

I also want to inform you that your Defendant  
have not Responded to my Grievance's on G/O GOWAT  
and MR FRIEDMAN and my Grievance's to change the  
DOC Policy on hair cut exemptions, thereby denying  
me access to court and my Request to attend  
LAW library are not being processed by the unit  
mangement team, MR FRIEDMAN a defendant is head  
of and he made me cut my Religious hair a issue now  
being adjudicated this is the ~~see~~ Second time please  
speak to you clients! I also wish to speak to you about  
Supplemental Pleading, this will save us a lot of time  
if you will agree to allow supplemental pleading now, because  
I will file a motion for injunction to stay proceedings  
pending appeal which I believe will be granted.

Respectfully

William Branch CF3756



Name & No. CF3756 Brauch  
P.O. Box 256  
Waymart, PA 18472-0256

INMATE MAIL  
PA DEPARTMENT OF CORRECTIONS

~~Legal~~ J. Conner  
~~Mail~~ Po Box 983  
Harrisburg Pa. 17108

**FILED**  
HARRISBURG, PA

MAR 12 2004

MARY E. DIANDREA, CLERK

Per

